

KELLER BENVENUTTI KIM LLP

TOBIAS S. KELLER (Cal. Bar No. 151445)
(tkeller@kbbkllp.com)

DARA L. SILVEIRA (Cal. Bar No. 274923)
(dsilveira@kbbkllp.com)

650 California Street, Suite 1900

San Francisco, California 94108

Telephone: (415) 496-6723

Facsimile: (650) 636-9251

GOODWIN PROCTER LLP

BRETT M. SCHUMAN (Cal. Bar No. 189247)

(BSchuman@goodwinlaw.com)

JENNIFER BRIGGS FISHER (Cal. Bar No. 241321)

(JFisher@goodwinlaw.com)

Three Embarcadero

San Francisco, California 94111

Telephone: (415) 733-6000

Facsimile: (415) 677-9041

Attorneys for Appellees

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re:

ANTHONY SCOTT LEVANDOWSKI,

Reorganized Debtor.

Case Nos. 4:22-cv-02781-YGR;
4:22-cv-02783-YGR;
4:22-cv-02786-YGR; and
4:22-cv-02789-YGR
(Jointly Administered)

On Appeal from Bankruptcy Court
Case No. 3:20-bk-30242-HLB

The United States of America, on behalf of the
Internal Revenue Service, and California
Franchise Tax Board,

Appellants,

v.

The Levandowski Residual Liquidation Trust, as
successor to the Debtor in Possession, and
Anthony S. Levandowski,

Appellees.

**DECLARATION OF DARA L.
SILVEIRA IN SUPPORT OF
APPELLEES' MOTION PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 8009(f) FOR
ACCEPTANCE OF DOCUMENTS
FILED UNDER SEAL**

[No Hearing Requested]

1 I, Dara L. Silveira, hereby declare pursuant 28 U.S.C. § 1746:

2 1. I am an associate with the firm of Keller Benvenutti Kim LLP, a law firm with
3 offices at 650 California Street, Suite 1900, San Francisco, California 94108. I make the
4 statements contained herein of my own personal knowledge and if called upon to so, could
5 testify competently to them.

6 2. I submit this Declaration in support of the *Appellees' Motion Pursuant to Federal*
7 *Rule of Bankruptcy Procedure 8009(f) for Acceptance of Documents Filed Under Seal* (the
8 "Motion").¹

9 3. One of the key terms of the global resolution between the Debtor, Google, and
10 Uber was the payment by Uber to Google of the Main Uber Payment, the amount of which Uber
11 requested be kept confidential. The Bankruptcy Court granted numerous sealing and redaction
12 motions surrounding the Main Uber Payment.

13 4. Uber has requested that the amount of the Main Uber Payment be protected from
14 disclosure before this Court as well.

15 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
16 inquiry, the foregoing is true and correct. Executed this twenty-fourth day of October, 2022, in
17 San Francisco, California.

18 /s/ Dara L. Silveira
19 Dara L. Silveira
20
21
22
23
24
25
26

27
28 ¹ Capitalized terms used but not defined herein shall have the meanings attributed to them in the Motion.